

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE:)
)
CUMMINGS MANOOKIAN, PLLC,) Case No. 3:19-bk-07235
Debtor.) Chapter 7
) Judge Walker
JEANNE ANN BURTON, TRUSTEE,)
)
Plaintiff,)
)
v.)
)
HAGH LAW, PLLC; AFSOON)
HAGH; MANOOKIAN, PLLC; and)
FIRST-CITIZENS BANK & TRUST)
COMPANY,)
Defendants.)
) Adv. Proc. No. 3:20-ap-90002

**NOTICE OF DEPOSITION OF BRIAN MANOOKIAN, MANOOKIAN, PLLC
AND CUMMINGS MANOOKIAN, PLC**

Pursuant to Federal Rules of Bankruptcy Procedure 7026 and 7030 Jeanne Ann Burton, Chapter 7 Trustee and Plaintiff in this action, respectfully gives notice that she will take the deposition of Brian Manookian, individually and as the corporate representative of Manookian, PLLC and Cummings Manookian, PLC, on May 10, 2022¹, beginning at 10:00 a.m. Central time in Courtroom Two, 701 Broadway, Nashville, Tennessee 37203, pursuant to the terms of the Court's Order dated March 28, 2022. The deposition will be recorded by stenographic and/or videographic means. The topics to be addressed in the deposition are any nonprivileged matters relevant to any party's claims or defenses,

¹ The Defendants previously asked to switch the dates of the Afsoon Hagh and Brian Manookian depositions, such that Ms. Hagh would be deposed on May 9 and Mr. Manookian on May 10. The Trustee agreed.

pursuant to Rule 26(b)(1) of the Federal Rules of Civil Procedure made applicable to this matter by Rule 7026 of the Federal Rules of Bankruptcy Procedure. The Trustee anticipates addressing the following topics:

Brian Manookian, individually:

- Background of Mr. Manookian's law practice
- Mr. Manookian's relationship with the Debtor
- Mr. Manookian's knowledge of the operations of the Debtor
- Work performed by Mr. Manookian and/or any other attorneys on the *Fitzgerald* case
- The settlement of the *Fitzgerald* case and distribution of settlement proceeds
- Work performed by Mr. Manookian and/or any other attorneys on the *Shoemaker* case
- Expenses advanced by and/or reimbursed to Mr. Manookian in the *Shoemaker* case
- Waiver of fees executed by Mr. Manookian in the *Shoemaker* case
- Work performed by Mr. Manookian on any other case listed in Paragraph 23 of the Complaint in this matter

Brian Manookian, as representative of Manookian, PLLC:

- The founding and operations of Manookian, PLLC
- Work performed by Manookian, PLLC and/or any other attorneys on the *Fitzgerald* case
- The settlement of the *Fitzgerald* case and distribution of settlement proceeds
- Work performed by Manookian, PLLC and/or any other attorneys on the *Shoemaker* case

- Expenses advanced by and/or reimbursed to Manookian, PLLC in the *Shoemaker* case
- Work performed by Manookian, PLLC on any other case listed in Paragraph 23 of the Complaint in this matter

Brian Manookian, as representative of Cummings Manookian, PLC:

- The founding and operations of Cummings Manookian, PLC
- Work performed by Cummings Manookian, PLC and/or any other attorneys on the *Fitzgerald* case
- Work performed by Cummings Manookian, PLC and/or any other attorneys on the *Shoemaker* case
- Expenses advanced by Cummings Manookian, PLC in the *Fitzgerald* and/or *Shoemaker* cases
- Work performed by Cummings Manookian, PLC on any other case listed in Paragraph 23 of the Complaint in this matter

Dated: April 25, 2022

Respectfully Submitted,

/s/ Phillip G. Young, Jr.

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Special Counsel for Jeanne Ann Burton,
Trustee

Certificate of Service

The undersigned hereby certifies that a true and exact copy of the foregoing has been served via electronic notice/ECF on all parties having made an appearance herein.

This 25th day of March, 2022.

/s/ Phillip G. Young, Jr.

Phillip G. Young, Jr.